



**TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.**

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October 24, 2012

Via Email: [JOT@wapa.gov](mailto:JOT@wapa.gov); Ms. Anita Decker: [adecker@wapa.gov](mailto:adecker@wapa.gov)

RE: Defining the Future – Next Steps

Tri-State Generation and Transmission Cooperative, Inc. (Tri-State) is a not-for-profit wholesale electric generation and transmission cooperative based in Colorado. Its mission is to provide reliable, cost-based wholesale electricity to its forty-four not-for-profit distribution cooperative and public power district member systems while maintaining high environmental standards. These distribution cooperatives and public power districts serve approximately six hundred thousand predominately rural customers over 200,000 square miles of territory in Colorado, Wyoming, Nebraska and New Mexico. To meet its members' electricity needs, Tri-State generates or purchases power produced by coal, natural gas and hydropower as well as intermittent renewables such as wind and solar.

12% of the resources sold to its members are renewable hydroelectric generation marketed by the Western Area Power Administration (WAPA). Hence, Tri-State and its members have a vested interest in all aspects of the "Defining the Future" process, and have participated in the workshops and webinar as well as submitting comment on the initial materials on August 17, 2012.

It is our understanding that the next step in this process will be the early November issuance of a Federal Register notice containing recommendations from the JOT Team and soliciting comment. Due to the potentially broad and technical nature of the recommendations, Tri-State is requesting a 90-day period for public comment. Once we have had the opportunity to assess the recommendations, it may be necessary for us to request additional time. Considering the amount of effort invested in this process thus far, we sincerely hope the JOT Team and WAPA's senior management team will also be provided sufficient time to consider our and others comments prior to finalizing any recommendations. We strongly recommend the Administration issue a Federal Register notice containing the final recommendations to the Secretary that discusses the comments DOE receives on the draft recommendations and explains why the JOT accepted or rejected those comments in developing the final recommendations to Secretary Chu. Only such a process, that tracks the requirements of the Administrative Procedure Act ("APA") for formal rulemakings, will provide the transparency that DOE has said it supports in this process.

A significant amount of time and expense on the part of all WAPA's customers have been incurred in an effort to have meaningful participation in this process notwithstanding the cost of the workshops and WAPA staff time that is being included in WAPA's customer rates. To reiterate one of the comments from our August 17 letter, TSGT has a long and collaborative working relationship with WAPA. We are prepared to work with WAPA along with other WAPA customers to address specific objectives in a methodical and practical manner. We highly recommend that any "next steps" embrace that approach.

Thank you for considering our request.

Sincerely,

Maude Grantham-Richards  
Senior Transmission Policy Analyst

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